

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re**

**FIELDWOOD ENERGY III LLC, *et al.*,<sup>1</sup>**

**Post-Effective Date Debtors.**

**Chapter 11**

**Case No. 20-33948 (MI)**

**DECLARATION OF DANIEL F. X. GEOGHAN IN SUPPORT OF FINAL  
FEE APPLICATION OF COLE SCHOTZ P.C. FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AS CO-COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE  
PERIOD FROM AUGUST 20, 2020 THROUGH MARCH 31, 2021**

I, Daniel F. X. Geoghan, declare under penalty of perjury:

1. I am a partner in the Bankruptcy and Corporate Restructuring Group at Cole Schotz P.C. ("**Cole Schotz**"), a law firm which employs approximately 140 attorneys and maintains an office for the practice of law at 901 Main Street, Suite 4120, Dallas, Texas 75202.

I am the lead attorney from Cole Schotz which served as counsel for the Official Committee of

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

Unsecured Creditors (the “**Committee**”) until January 19, 2021.<sup>2</sup> I work from the New York office at 1325 Avenue of the Americas, 19<sup>th</sup> Floor, New York, New York 10019.

2. I have read the *Final Fee Application of Cole Schotz P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from August 20, 2020 Through March 31, 2021* (the “**Application**”) filed contemporaneously herewith.<sup>3</sup> To the best of my knowledge, information, and belief, formed after reasonable inquiry, the statements contained in the Application are true and correct. In addition, I believe that the Application is in conformity with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, this Court’s orders and the U.S. Trustee Guidelines.

3. In connection therewith, I hereby certify that:

- a. The fees and disbursements sought in the Application are billed at rates customarily employed by Cole Schotz and generally accepted by Cole Schotz’s clients. In addition, none of the professionals seeking compensation varied their hourly rates based on the geographic location of the Debtors’ cases;
- b. In providing a reimbursable expense, Cole Schotz does not make a profit on that expense, whether the service is performed by Cole Schotz in-house or through a third party;
- c. In accordance with Bankruptcy Rule 2016(a) and Bankruptcy Code section 504, no agreement or understanding exists between Cole Schotz and any other person for the sharing of compensation to be received in connection with these Chapter 11 Cases except as authorized pursuant to the Bankruptcy Code, Bankruptcy Rules and Local Rules; and
- d. All services for which compensation is sought were professional services on behalf of the Committee and not on behalf of any other person.

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<sup>2</sup> Representation of the Committee was transferred to Pachulski Stang Ziehl & Jones on January 19, 2021. Cole Schotz remained engaged from January 19, 2021 to March 31, 2021 solely for the purpose of transition and preparing the monthly fee statements and fee applications.

<sup>3</sup> Capitalized terms used but not defined herein shall have the meanings assigned to them in the Application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 11, 2021, in New York, New York.

By: /s/ Daniel F. X. Geoghan  
Daniel F. X. Geoghan